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Attorneys for Defendants

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X		
JAMES GOULD,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	AMENDED
COUNTY OF ROCKLAND,	:	NOTICE OF MOTION
SUSAN SHERWOOD, sued in her individual	:	
capacity, JACQUELINE STORMES, sued in her	:	
individual capacity, KATHLEEN	:	
TOWER-BERNSTEIN, sued in her individual	:	07 Civ. 2837 (CLB)
capacity, and JILL LAGNADO, sued in her	:	
individual capacity,	:	ECF Case
	:	
Defendants.	:	
-----X		

PLEASE TAKE NOTICE that on July 13, 2007, at 10:00 a.m. defendants County of Rockland, Susan Sherwood, Jacqueline Stormes, Kathleen Tower-Bernstein, and Jill Lagnado (hereinafter collectively, "Defendants"), by their attorneys, Patterson Belknap Webb & Tyler LLP, will move the Court, before the Honorable Charles L. Brieant, in Courtroom 218 of the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, for the following relief:

1. Granting judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c) in favor of Defendants on the complaint because plaintiff fails to state a claim upon which relief can be granted;

2. Staying discovery pending the resolution of Defendants' motion for judgment on the pleadings; and

3. Granting such other and future relief as the Court deems just and proper.

This motion is based upon the files, records and proceedings herein, including the Complaint and Answer, Affirmative Defenses, and Counterclaims, with exhibits, attached hereto at Tabs 1 and 2, and the accompanying Memorandum of Law in Support of Defendants' Motion for Judgment on the Pleadings and to Stay Discovery.

Dated: June 12, 2007

Respectfully submitted,

/s/John D. Winter

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